

Ms Joanne Simpson
London Borough of Richmond upon
Thames
Planning Department
Civic Centre (44) York Street
Twickenham
Middlesex
TW1 3BZ

Our ref: SL/2019/119116/03-L01
Your ref: 19/0646/FUL
Date: 10 February 2020

Dear Ms Simpson

DEMOLITION OF EXISTING BUILDINGS (WITH THE RETENTION OF A SINGLE DWELLING) AND REDEVELOPMENT OF THE SITE TO PROVIDE UP TO 116 RESIDENTIAL UNITS AND 175 SQM COMMERCIAL FLOORSPACE; LANDSCAPED AREAS; WITH ASSOCIATED PARKING AND HIGHWAYS WORKS AND OTHER WORKS ASSOCIATED WITH THE DEVELOPMENT.

GOULD ROAD, TWICKENHAM, TW2 6RT.

Thank you for consulting us on the above application.

Following the submission of amended documents dated November 2019, we have no objection and have the following comments to make.

Environment Agency Position

Development that encroaches on watercourses can have a potentially severe impact on their ecological value. The riparian zone is particularly important for foraging and migrating species, such as bats, along the river corridor and should be protected from the built environment. Networks of undeveloped buffer zones might also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the river basin management plan. This is particularly important in urban areas where creating space for wildlife can help to mitigate water quality issues as well as providing areas of high biodiversity. The proposed development will therefore be acceptable if a planning condition is included requiring a scheme to be agreed to protect a 5 metre wide buffer zone around the watercourse.

Condition

No development shall take place until a scheme for the provision and management

of a 5 metre wide buffer zone alongside the River Crane has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping.

The scheme shall include:

- Plans showing the extent and layout of the buffer zone.
- Details of any proposed planting scheme (for example, native species).
- Details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- Details of in channel enhancements should be located primarily along the stretch of river adjacent to the site and any agreement with FORCE or the Crane Valley Partnership should reflect that enhancements are taking place within the boundary of the site prior to elsewhere within the river.
- Details of the revised lighting plan providing a dark corridor to the river and buffer zone.
- Details of any footpaths or boardwalks proposed within the buffer zone.

Reason(s)

Land alongside the River Crane is particularly valuable for wildlife and it is essential this is protected. This is evidenced by the bat survey submitted detailing foraging bats along the river corridor as well as notes that stag beetles and kingfishers were identified during the survey. Providing an adequate buffer zone within the development will provide further habitat for these protected species and support the development in greening this urban area.

This approach is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Further Discussions

To achieve the best results for the development, we welcome a meeting with the applicant to discuss the improvements in detail. Please contact us on the email address below to arrange this.

Please do not hesitate to contact me if needed.

Yours sincerely

Mr Randeep Dhanjal
Planning Advisor

Direct e-mail kslplanning@environment-agency.gov.uk